

Approved: Gillian Grossman
CHRISTOPHER J. CLORE / GILLIAN GROSSMAN
Assistant United States Attorneys

Before: HONORABLE JUDITH C. MCCARTHY
United States Magistrate Judge
Southern District of New York

- - - - - X
UNITED STATES OF AMERICA : 16 mag 7454
: COMPLAINT
:
- v. - : Violation of
: 18 U.S.C. §§ 924(c) &
WILLIAM MATEO, : 2113(d)
a/k/a "William T. Henn," :
: COUNTY OF OFFENSE:
Defendant. : ROCKLAND
:
- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

GEORGE GJELAJ, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI") and charges as follows:

COUNT ONE
(Bank Robbery)

1. On or about November 18, 2016, in the Southern District of New York and elsewhere, WILLIAM MATEO, a/k/a "William T. Henn," the defendant, unlawfully, willfully, and knowingly, by force and violence, and by intimidation, did take, from the persons and presence of others, property and money belonging to and in the care, custody, control, management, and possession of a bank, to wit, the Key Bank, located at 388 Route 59, Central Nyack, New York, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), and in committing said offense did assault persons and put in jeopardy the lives of persons by the use of a dangerous weapon and device, to wit, a silver and black 9-milimeter Jennings semi-automatic handgun.

(Title 18, United States Code, Sections 2113(a) & (d) and 2.)

COUNT TWO
(Firearms Offense)

2. On or about November 18, 2016, in the Southern District of New York, WILLIAM MATEO, a/k/a "William T. Henn," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely the bank robbery charged in Count One of this Complaint, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii) and
2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

3. I am a Special Agent with the FBI. I have been personally involved in the investigation of this matter. This Affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this Affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Background

4. Based on my conversations with an officer ("Officer-1") from the Clarkstown Police Department (the "CPD"), my review of reports prepared by the CPD and other members of law enforcement in connection with this investigation, and my review of surveillance images captured inside the Bank during the robbery, I have learned, in substance and in part, the following:

a. On or about November 18, 2016, the CPD received a report of a bank robbery at a Key Bank, located at 388 Route 59, Central Nyack, New York (the "Bank"). Officer-1 and other officers from the CPD reported to the Bank, reviewed surveillance video, and spoke with individuals who were present

in and around the Bank during the robbery and whose accounts of the events of the robbery were substantially similar.

b. At approximately 1:55 p.m., an unknown black male ("UM-1") standing between 5 feet 5 inches and 5 feet 8 inches tall entered the bank wearing a mask and gloves, and displaying a silver and black semi-automatic handgun. Upon entering the Bank, UM-1 stated, in sum and substance, "This is a robbery. Give me all your money. Give me all your money."

c. UM-1 approached two Bank tellers ("Teller-1" and "Teller-2") who provided UM-1 with approximately \$6,418.91 in cash from their respective drawers. UM-1 then approached the exit of the Bank. Prior to exiting the Bank, however, UM-1 stopped and stated, in sum and substance, "Don't push that button." Based on my training and experience, and my conversations with other law enforcement agents, I understand this statement to mean that UM-1 was directing Teller-1, Teller-2, and potentially other employees of the Bank, not to alert law enforcement regarding the robbery.

d. UM-1 then fired one round from the handgun in the direction of Teller-1. The round struck the wood partition separating Teller-1 and Teller-2. After firing the round, UM-1 exited the Bank, entered a dark-colored vehicle, and fled the area.

e. Officer-1 interviewed a witness ("Witness-1") who stated, in substance and in part, that Witness-1 was parked in a parking lot that is between the Bank and a strip mall, just prior to the robbery. Witness-1 had parked his car in a parking spot that was facing the Bank. As Witness-1 was leaving the parking lot, Witness-1 observed a black Honda Accord parking in a parking spot in front of the Bank, nose-to-nose with Witness-1's vehicle. Witness-1 observed in the black Honda Accord a black male with a goatee that was groomed into a point at the end, wearing gold-rimmed aviator sunglasses and a black hooded sweatshirt.

5. Based on my conversations with Officer-1, and my review of reports prepared by the CPD and other members of law enforcement, I have learned, in substance and in part, that the Bank has surveillance cameras in the Bank's parking lot and that those cameras captured images of the vehicle described above.

6. Based on my conversations with a member of the FBI's Westchester County Safe Streets Task Force ("TFO-1"), I know that TFO-1 reviewed the surveillance images captured by the

Bank's cameras and determined that the vehicle appeared to be a black Honda Accord. TFO-1 printed a copy of a surveillance image of the vehicle and brought the image to a car dealership located near the Bank (the "Dealership"). Based on my conversations with TFO-1, I have learned, in substance and in part, that an employee of the Dealership identified the vehicle in the surveillance image as a 2011 or 2012 Honda Accord.

7. Based on my conversations with Officer-1, I have also learned, in substance and in part, that, based on Officer-1's review of the surveillance images of the vehicle, Officer-1 was able to determine that the vehicle had a New York license plate. Officer-1 was also able to identify the last four digits of the Vehicle's license plate which read "4727." Using the information obtained from the Dealership and the last four digits of the vehicle's license plate, Officer-1 reviewed a search of a law enforcement database, which contains vehicle registration information for vehicles registered in New York State, for the registration information for a 2011 or 2012 black Honda Accord with a New York license plate ending in "4727." Based on that search, Officer-1 identified the vehicle as a 2012 black Honda Accord bearing New York license plate number HAH4727 (the "Vehicle") and learned that the Vehicle was registered to WILLIAM MATEO who resides at 736 Jacqueline Drive, Valley Cottage, New York 10989 (the "Residence").

8. Based on my conversations with Officer-1, and my review of reports prepared by officers of the CPD and other law enforcement agents, I have learned, in substance and in part, that, using the registration information obtained for the Vehicle, law enforcement was able to identify and review the Facebook page belonging to WILLIAM MATEO, a/k/a "William T. Henn," the defendant. Based on law enforcement's review of MATEO's Facebook page, law enforcement agents determined that MATEO matched the description provided to law enforcement agents by Witness-1.

9. Based, in part, on the facts described above, and additional information obtained by law enforcement agents, on or about November 19, 2016, I obtained a search warrant for the Residence and the Vehicle from the Honorable Paul E. Davison, United States Magistrate Judge (the "Search Warrant"). In substance and in part, the Search Warrant authorized law enforcement agents to search the Residence, and any closed containers/items contained therein and the Vehicle and all locked, closed, and hidden containers and compartments therein.

10. Based on my participation in this investigation, I

know that on or about November 20, 2016, law enforcement agents executed the Search Warrant of the Residence (the "Residence Search") and the Vehicle (the "Vehicle Search"). During the Residence Search, law enforcement agents recovered, among other things, a mask matching the mask worn during the robbery, a box of disposable gloves matching the gloves worn during the robbery, and a Sentry Safe (the "Safe"). Law enforcement agents searched the Safe and recovered, among other things, approximately \$2,427 in United States currency, various shell casings, and live ammunition. In addition, law enforcement agents recovered from the Safe a digital scale, empty plastic bags, and a white powder that, based on my training and experience, appeared to be cocaine. During the Vehicle Search, law enforcement agents recovered a pair of gold-rimmed Ray-Ban sunglasses matching the sunglasses described by Witness-1, and approximately \$2,030 in United States currency.

11. Based on my participation in this investigation, and my conversations with other members of law enforcement, I have learned, in substance and in part, the following:

a. On or about November 20, 2016, law enforcement obtained information from Verizon Wireless that a cellphone with a number associated with WILLIAM MATEO, a/k/a "William T. Henn," the defendant, was located in the vicinity of a Days Inn Hotel located at 25 Valley Avenue, Elmsford, New York (the "Hotel").

b. Upon their arrival at the Hotel, law enforcement agents observed the Vehicle in the Hotel's parking lot. Shortly thereafter, law enforcement agents observed WILLIAM MATEO, a/k/a "William T. Henn," the defendant, exit a hotel room and approach the Vehicle.

c. Law enforcement agents detained MATEO and asked MATEO if he had a weapon. MATEO stated, in substance and in part, that he had a firearm in a book bag located in his hotel room. MATEO subsequently consented to a search of his hotel room (the "Room"). Law enforcement agents also asked MATEO if he had a jacket in the Vehicle that he would like the agents to retrieve, as MATEO appeared to be shivering. MATEO responded, in sum and substance, that he had a jacket in the backseat of the Vehicle. Law enforcement agents then recovered from the backseat of the Vehicle a black sweatshirt matching the sweatshirt worn during the robbery.

d. During the search of the Room, law enforcement agents recovered, among other things, a silver and black 9-milimeter Jennings semi-automatic handgun (the "Firearm") that

matched in appearance the handgun used during the robbery, one glove matching the description of the glove worn during the robbery, and a firearm magazine containing approximately 11 9-milimeter rounds.

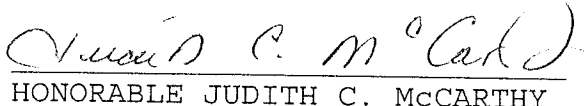
e. Law enforcement officers placed WILLIAM MATEO, a/k/a "William T. Henn," under arrest. After the arrest of MATEO, he was read his Miranda warnings, waived his rights, and admitted, in substance and in part, that he committed the robbery of the Bank and discharged in the commission thereof the Firearm recovered in the Room.

WHEREFORE, I respectfully request that WILLIAM MATEO, a/k/a "William T. Henn," the defendant be imprisoned or bailed as the case may be.



GEORGE GJELAJ
Special Agent
Federal Bureau of Investigation

Sworn to before me this
21 day of November 2016



HONORABLE JUDITH C. MCCARTHY
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK